

1 Mark S. O'Connor (011029)
2 BEUS GILBERT PLLC
3 701 North 44th St.
4 Phoenix, AZ 85008
5 Telephone: (480) 429-3000
6 moconnor@beusgilbert.com

7 Ramon Rossi Lopez (admitted *pro hac vice*)
8 (CA Bar No. 86361)
9 LOPEZ MCHUGH LLP
10 100 Bayview Circle, Suite 5600
11 Newport Beach, CA 92660
12 rlopez@lopezmchugh.com

13 *Attorneys for Plaintiffs*

14 James R. Condo (#005867)
15 Kristine L. Gallardo (#033975)
16 SNELL & WILMER L.L.P.
17 One Arizona Center
18 400 E. Van Buren, Suite 1900
19 Phoenix, AZ 85004-2204
20 Telephone: (602) 382-6000
21 jcondo@swlaw.com
22 kgallardo@swlaw.com

23 Richard B. North, Jr. (admitted *pro hac vice*)
24 Georgia Bar No. 545599
25 Matthew B. Lerner (admitted *pro hac vice*)
26 Georgia Bar No. 446986
27 NELSON MULLINS RILEY & SCARBOROUGH LLP
28 Atlantic Station
1 201 17th Street, NW, Suite 1700
2 Atlanta, GA 30363
3 Telephone: (404) 322-6000
4 richard.north@nelsonmullins.com
5 matthew.lerner@nelsonmullins.com

6 *Attorneys for Defendants*

7 *C. R. Bard, Inc. and*
8 *Bard Peripheral Vascular, Inc.*

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 IN RE: Bard IVC Filters Products
12 Liability Litigation

13 No. 2:15-MD-02641-DGC

14 **JOINT MOTION TO EXTEND THE**
15 **TIME FOR FILING A DISMISSAL FOR**
16 **THOSE CASES THAT ARE SUBJECT**
17 **TO SETTLEMENT AGREEMENTS**
18 **AND THE PLAINTIFFS HAVE SIGNED**
19 **RELEASES**

1 In an order dated July 16, 2020 (Doc. 21540), the Court ordered the parties to submit
2 a joint report on November 13, 2020 identifying those cases remaining in the MDL that
3 were not dismissed by November 2, 2020. The order further required the parties to submit
4 the necessary information regarding those cases so that they could be remanded or
5 transferred to the appropriate jurisdiction.

6 With this motion, the parties respectfully request that the Court extend that deadline
7 for a specific subset of the remaining cases that are unquestionably settled. This subset
8 consists of approximately 901 cases which are subject to settlement agreements, where the
9 plaintiffs have already signed a release of all claims against the defendants (thereby
10 committing to the settlements and waiving the ability to opt out of the settlements). The
11 plaintiffs have been unable to dismiss those cases, however, because – for a variety of
12 reasons – the settlement funds have not been disbursed as of yet. Additional time should
13 permit the parties to complete the resolution of lien issues and to finalize the settlements,
14 thereby allowing the disbursement of funds and the settlement of the actions.

15 For those reasons, the parties jointly request that the Court extend the deadline for
16 filing dismissals in the cases identified on Exhibit “A” until March 15, 2021. In turn, the
17 parties would submit the report required by the July 16, 2020 order for the remaining
18 plaintiffs who have not filed a dismissal.

19 The parties stand ready to address any questions or concerns about this request that
20 the Court may have.

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1 RESPECTFULLY SUBMITTED this 6th day of November, 2020.
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4 BEUS GILBERT PLLC

5 By: /s/ Mark O'Connor (with permission)

6 Mark S. O'Connor (011029)
7 701 North 44th St.
8 Phoenix, AZ 85008

9 Ramon Rossi Lopez
10 (admitted *pro hac vice*)
11 CA Bar No. 86361
12 LOPEZ MCHUGH LLP
13 100 Bayview Circle, Suite 5600
14 Newport Beach, CA 92660

15 *Co-Lead/Liaison Counsel for*
16 *Plaintiffs*

17 NELSON MULLINS RILEY &
18 SCARBOROUGH, LLP

19 By: /s/ Richard B. North, Jr.

20 Richard B. North, Jr. (*pro hac vice*)
21 Georgia Bar No. 545599
22 Matthew B. Lerner (*pro hac vice*)
23 Georgia Bar No. 446986
24 Atlantic Station
25 201 17th Street, NW / Suite 1700
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27 James R. Condo (005867)
28 Kristine L. Gallardo (033975)
1 SNELL & WILMER L.L.P.
2 One Arizona Center
3 400 E. Van Buren
4 Phoenix, AZ 85004-2204

5 *Attorneys for C. R. Bard, Inc. and Bard*
6 *Peripheral Vascular, Inc.*